

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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D. GEORGE SWEIGERT

Plaintiff,

vs.

JASON GOODMAN,

Defendant

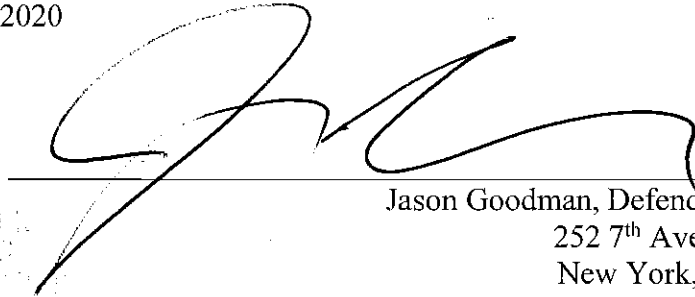
Case No.: 1:18-cv-08653-VEC-SDA

DEFENDANT'S OPPOSITION TO
PLAINTIFF'S NOTICE OF AMENDED
MOTION IN OPPOSITION TO
DEFENDANT'S COUNTERCLAIM PAPERS
(DKT. 145) PURSUANT TO RULE 12(B)(6)
FAILURE TO STATE A CAUSE, OR, IN
THE ALTERNATIVE, RULE 12(B)(L)
LACK OF JURISDICTION

**DEFENDANT'S OPPOSITION TO PLAINTIFF'S NOTICE OF AMENDED MOTION IN
OPPOSITION TO DEFENDANT'S COUNTERCLAIM PAPERS (DKT. 145) PURSUANT
TO RULE 12(B)(6) FAILURE TO STATE A CAUSE, OR, IN THE ALTERNATIVE,
RULE 12(B)(L) LACK OF JURISDICTION**

Defendant Jason Goodman Pro Se respectfully submits this opposition to Plaintiff's motion. This pleading is true and correct to the knowledge of the undersigned, except as to matters alleged on information and belief, and that as to matters that the undersigned believe are true. See N.Y.C.P.L.R. 3020. So sworn under the penalties of perjury.

Signed this 29th day of October 2020



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DEFENDANT'S OPPOSITION TO PLAINTIFF'S NOTICE OF AMENDED MOTION IN OPPOSITION TO
DEFENDANT'S COUNTERCLAIM PAPERS (DKT. 145) PURSUANT TO RULE 12(B)(6) FAILURE TO
STATE A CAUSE, OR, IN THE ALTERNATIVE, RULE 12(B)(L) LACK OF JURISDICTION - I

INTRODUCTION

Defendant is a pro se non-attorney who understands the purpose of the courts to be the administration of justice. Allowing this legal matter to carry on with even one more pleading or motion from this vexatious Plaintiff would fly in the face of that notion.

Defendant has never met or spoken of Plaintiff prior to Plaintiff making himself known to Defendant via the publication of a threatening video on or around June 15, 2017. Defendant has not attempted to make claims of Defamation related to that more than three-year-old video. The video is referenced in this matter to demonstrate the putative genesis of this dispute and the dynamic nature of Plaintiff's claims over time. Plaintiff is now on a fishing expedition to concoct anything he can muster despite having no true injury for which relief can be granted. Plaintiff's only purpose is his bad faith effort to exact revenge for some perceived wrongdoing. The newest supplemental claims are merely the latest round of fictions imagined by the Plaintiff in his campaign to, as he said in his own words, sue Defendant "for the rest of his life". Such a statement is a clear demonstration of wrongful purpose. Plaintiff has brought this legal action in bad faith and for the wrongful purpose of deliberately causing financial damage and other harm to the Defendant. Pursuant to the unclean hands doctrine, Plaintiff's remaining claims should be denied and this entire matter should be dismissed with prejudice. In the interest of justice, Sweigert must be declared a vexatious litigant and specifically denied the ability to bring future lawsuits as a pro se Plaintiff. This would not deny him his right to access the courts, but instead would put a justifiable governor on his wild abuses of the legal system, requiring him to first convince an embarred attorney that his feckless ramblings are suitable for litigation and then

1 expend his own financial resources before wasting those of the court or the targets of his litigious
2 harassment.

3 Sweigert has demonstrated fundamental bad faith by repeatedly and deliberately
4 provoking the Defendant in his attempts to create exaggerated or even entirely made up claims.
5 One of the primary methods Swiebert employs to masquerade his provocations is to present them
6 as statements to law enforcement or claims in this and other civil lawsuits. He also conveniently
7 gerrymanders his evidentiary submissions to omit his provocations and include only parts of
8 responses he then attempts to present as causes of action. Plaintiff is aware he has immunity
9 from defamation claims arising from allegations made in this manner and does so to circumvent
10 libel claims against himself. Plaintiff then publishes defamatory blog posts on his smear
11 campaign website SDNY.INFO that reference his frivolous legal filings and reports on them as
12 “news”. This pattern effectively allows him to defame a target while side stepping any legal
13 exposure as he broadcasts false claims to a wide audience. As with all his inflammatory posts,
14 he then removes them after his goal has been achieved, complicating the process of bringing
15 them into evidence. As demonstrated in his own filings, he also uses Twitter and other social
16 media platforms in an attempt to interfere with the normal business of the Defendant and to
17 discourage the public from trusting or doing business with Defendant. Sweigert takes advantage
18 of laws intended to protect legitimate journalists engaged in good faith efforts to report news, but
19 his abuse of these laws are, in and of themselves, a further demonstration of bad faith. As the
20 court is aware Sweigert has not even provided a valid mailing address of record in this matter as
21 evidenced by the excessive number of change of address filings and the large number of returned
22 mail items on the docket that were undeliverable by the U.S. Postal service. All items Defendant
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28 DEFENDANT’S OPPOSITION TO PLAINTIFF’S NOTICE OF AMENDED MOTION IN OPPOSITION TO
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1 has mailed to Plaintiff in compliance with Federal Rules of Civil Procedure have been returned
2 by the USPS as previously demonstrated in these pleadings. In an investigation of this
3 circumstance, Defendant traveled to Arizona in 2019 as previously plead and discovered
4 evidence that causes him to believe Plaintiff conspired with an induvial named Mari Rapp aka
5 Sugar Shine ("Rapp") to deceive the Defendant and this court into thinking he had legitimate
6 possession of U.S. Postal service PO Box 152 in Mesa AZ which he did not. Plaintiff hides his
7 true address in further efforts to shield himself from defamation counterclaims or enforcement of
8 potential judgements while he simultaneously utilizes a wide range of electronic and other means
9 to continually defame, harass and provoke the Defendant. This behavior is yet another
10 demonstration of bad faith. Plaintiff uses social media platforms such as Twitter specifically so
11 the defamatory or provocative material can be removed resulting in the "absence of evidence" he
12 constantly refers to.

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15 Another method Sweigert has utilized which has been openly discussed online and in
16 emails between Manuel Chavez and others previously mentioned in these pleadings is to
17 overwhelm Goodman with litigation. It is apparent even in this matter that Sweigert is flooding
18 the docket with frivolous filings, repeated amendments to those filings, supplements to those
19 amendments and so on. In a recent YouTube video, Sweigert has stated his intention to
20 intervene in NATAS v Multimedia System Design INC. Sweigert claims to have no direct
21 communication with the specific parties that are suing Goodman, defaming him online and
22 harassing him in person. He does however communicate and interact with many of these
23 individuals via social media including YouTube and Twitter, among other means. Additionally,
24 during the course of this legal action, Sweigert has communicated with his brother George Webb
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28 DEFENDANT'S OPPOSITION TO PLAINTIFF'S NOTICE OF AMENDED MOTION IN OPPOSITION TO
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1 Sweigert, ("Webb") and does not deny that. Webb has openly communicated with many of the
2 parties in question including Manuel Chavez so an indirect line of communication is likely.
3 Based on information and belief Defendant alleges that Sweigert and others in question use
4 YouTube and other social media platforms to "communicate" with each other via non-traditional
5 means. By using bizarre language and imagery that may well include hidden meanings, encoded
6 messages or clues to viewers who know what to look for, Sweigert employs a social media
7 version of the traditional espionage tactic of using "dead drops". A dead drop enables a form of
8 one way communication where the sender and recipient do not even know each other's identities.
9 According to Wikipedia is "A dead drop or dead letter box is a method of espionage tradecraft
10 used to pass items or information between two individuals (e.g., a case officer and an agent, or
11 two agents) using a secret location. By avoiding direct meetings, they could maintain operational
12 security." Similar to this traditional method of avoiding directly meeting, Defendant believes
13 Sweigert uses his social media accounts to communicate messages or instructions, while still
14 maintaining the ability to avoid perjury when pleading that he has never directly communicated
15 with a particular individual. The sheer volume of pleadings Goodman has been forced to review
16 and respond to has been overwhelming and has drained significant resources. Despite their lack
17 of merit, reviewing and responding to these pleadings has been a substantial burden in terms of
18 time, money and wasted resources. Defendant reminds the court that this matter was initially
19 brought by Plaintiff in a jurisdiction in which neither party resides or has any business, in a state
20 Defendant does not recall ever entering in his life and for a purpose the court found to be
21 improper. The initial filing was based entirely on an incident provoked by information and
22 statements made by Webb to Goodman, yet Webb has been conspicuously omitted from these
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1 actions. Since that time, Plaintiff has seized upon a wide range of allegations, most having no
2 basis in fact whatsoever, to allege a cornucopia of claims, the overwhelming majority of which
3 have already been dismissed.
4

5 In direct response to the supplements allowed by Magistrate Aaron's most recent order
6 (ECF No 160): in paragraph 39 Plaintiff alleges defamatory and libelous statements have
7 damaged Plaintiff in his business, trade and profession. However, in a video published on or
8 around October 21, 2020 titled *#SDNYORG Defango perks up over DoJ Google lawsuit*
9 *connections oooooooppss* which Plaintiff has removed, in reference to his endless filing of lawsuits
10 Plaintiff stated "I sit around my RV all day, there's nothing to do, I'm not working, I've got the
11 drip, drip, drip of the retirement coming in, I've got all day to work on these things". In direct
12 contrast to his pleading, Plaintiff clearly states he is retired and no longer engaged in whatever
13 profession he claims expertise in. Defendant fails to see how alleged defamation could affect the
14 status of a military pension or whatever ongoing retirement payments Plaintiff receives.
15

16 Additionally, the juvenile, irresponsible and seemingly insane behavior Plaintiff voluntarily
17 engages in on a daily basis on YouTube, Twitter and his blog would be likely to cause any
18 professional in virutally any field to find the Plaintiff unfit for employment. In presiding over
19 *Giuffre v Dershowitz*, the honorable Loretta Preska discussed the concept of an individuals'
20 reputation being so tarnished in the public, any further act of alleged libel or slander is moot.
21

22 Giuffre v. Dershowitz, 410 F. Supp. 3d 564, 574 n.3 (S.D.N.Y. 2019) ("You
23 argue at page 5 of your reply that if Ms. Maxwell's simple denials destroyed the plaintiff's
24 reputation, then Professor Dershowitz's worldwide rebuke, you say, destroyed her reputation
25 even more and now she's essentially libel proof. So is the rule to be taken from that that if you
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1 blast them pretty well the first time you can keep blasting them? Mr. Cooper: Well, you Honor,
2 the answer to that question is yes. (Tr. 18:13-"). Far different in this case, Defendant did NOT
3 engage in any defamatory statements or any public discussion at all pertaining to the Plaintiff
4 until AFTER Plaintiff made numerous public statements about his own family history of mental
5 illness and other depravity, effectively destroying his own public reputation and rendering
6 himself "libel proof". In a video Plaintiff has removed, but Defendant has preserved on Bitchute,
7 <https://www.bitchute.com/video/LLqDBTwylIsD/> Plaintiff admits that his father was treated by
8 the Veteran's Administration for schizophrenia and goes on to state his belief that his own
9 brother George Webb Sweigert ("Webb") has experienced a "schizophrenic break" and has gone
10 "over the edge". In a truly bizarre statement, Plaintiff further states his belief that physical abuse
11 from his now deceased father cured him "I seem to do better. Maybe all the beatings I took,
12 maybe that cured me." This and other public statements, including Webb's admission of sexual
13 intercourse with Sweigert's wife, his own sister in law, demonstrate deep rooted and highly
14 disturbing deviancy, and are surely far worse than any alleged statement by Defendant. Later in
15 paragraph 39 of the Supplemental Complaint, Plaintiff goes on to misrepresent facts, again in
16 bad faith with the inclusion of a deliberately truncated email chain, which omits Plaintiff's
17 instigating provocative statements. The email was sent to more than twenty five recipients
18 including various government agencies, the FBI and several attorneys general under the heading
19 "*Re: Identity of person calling Dr. Fauci's home unlisted number may have been identified*"
20 Sweigert includes only a portion of the email chain he initiated in an attempt to make Defendant
21 appear to have done something he simply never did. Defendant has never attempted to call
22 White House Coronavirus Task Force member Anthony Fauci and is not affiliated with the
23

1 individuals named in the email. In fact, in one of his own YouTube videos presented previously
2 in these pleadings in which he calls on individuals to take part in a “cyber militia” Sweigert
3 names the individual referred to in this email as Montegraph.

4
5 Furthermore, Sweigert omits his initial email which he CC’d to Defendant (**EXHIBT A**) for the
6 sole and specific purpose of agitating Defendant. This is a standard example of Plaintiff’s modus
7 operandi. Typically, Plaintiff sends an inflammatory email including false allegations to scores
8 of law enforcement and other recipients and carbon copies the Defendant. In an effort to
9 counteract any of the intended negative effect, Defendant responds and then Plaintiff attempts to
10 fashion a cause of action in this legal matter based on the response. With regard to statements in
11 paragraph 39 pertaining to a handicapped, vulnerable individual, Goodman has no knowledge of
12 this. An unknown viewer of Goodman’s show contacted Goodman unsolicited claiming to be a
13 former friend of Sweigert’s. To the best of Goodman’s recollection, the only information
14 conveyed was the first name Jimmy and the belief stated by the unknown individual that
15 Sweigert had abandoned his own son. This was alleged to be Sweigert’s own statement to the
16 unknown individual. Statements pertaining to disability come from Sweigert himself and
17 Defendant has no knowledge of this. It is worth noting that Sweigert does not deny abandoning
18 this individual, despite having copious time to sit around his recreational vehicle suing Goodman
19 and engaging in extrajudicial harassment for more than three years rather than making any effort
20 to enrich the life of his abandoned, allegedly handicapped son. This furthers Defendant’s belief
21 that Plaintiff is such a vile, despicable individual who has admitted to his own subhuman behavior
22 in so many public statements it is impossible to further damage his reputation via alleged slander
23 or libel. Each of the highlighted quotations of the statement “deadbeat dad” come from Twitter
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1 threads in which Plaintiff has eliminated the portion of the post that would show how he inserted
2 himself into Defendant's Twitter postings to provide false information from his SDNY.INFO
3 blog to Goodman's large Autofuss over 35,000 Twitter followers. Searching for those posts now
4 yields no result causing Defendant to believe Plaintiff has now deleted them as well. Defendant
5 is repeatedly provoked in this manner in response to overt actions from Plaintiff and Plaintiff is
6 repeatedly, deliberately omitting these pertinent facts and evidence from his filings in this legal
7 matter. This is a deliberate attempt at deception by omission and in Defendant's view constitutes
8 fraud on the court. The very action of inserting these provocative tweets is, in and of itself
9 cyberstalking or at very least additional bad faith effort. Plaintiff's communications and
10 attention are not wanted. He has been asked repeatedly to stop, yet he continues to provoke.
11 Despite Plaintiff's claims of "dozens" of twitter messages per day, Defendant cannot recall ever
12 initiating even one tweet that was not a direct response to a disparaging public tweet initiated by
13 Plaintiff. This is a child's game Plaintiff is attempting to play with the court and the Defendant.
14
15 40. To the best of Defendant's knowledge, none of the statements referenced were untrue. All
16 statements were either repetition of claims made by the Plaintiff himself, Plaintiff's own family
17 members or admitted former friends or statements of opinion formed from observing Plaintiff's
18 psychotic behavior.

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21 41. Claims of wife swapping have been conveyed firsthand to Defendant by Plaintiff's brother
22 Webb. Although Defendant is unaware of a legal definition of "wife swapping" in this context it
23 refers to Webb copulating with Sweigert's wife as it was explained to Defendant. At the time of
24 the statement, Plaintiff did not deny the allegation and in fact made additional confirming
25 statements that caused the Defendant to believe the allegation to be true. The Cyber Stalking
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1 claim is self-evident simply by observing the Plaintiff's maniacal obsession with producing
2 videos, tweets and blog posts including false and defamatory statements about Defendant. The
3 statement "dead beat dad" is based on the allegation of child abandonment from Plaintiff's
4 former friend, and Plaintiff has not denied abandoning his son, in fact, the former friend further
5 stated that in a moment of intimacy, Plaintiff claimed that abandoning his own son was his
6 greatest shame. Despite this, Plaintiff prefers to spend his time, money and energy engaging in
7 frivolous lawsuits intended to destroy Defendant financially, rather than using the remaining
8 years of his life to attempt to rectify the shameful way in which he has treated his own son.
9 Further evidence of apparent psychopathic behavior is revealed in the Bitchute video referenced
10 above in which Sweigert details his plan to destroy the medical career of his nephew, Joshua
11 Sweigert although it is not made clear if this is retaliation for Joshua's father Webb having
12 sexual intercourse with Sweigert's wife.
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15 42. Defendant does not believe any of his statements to be false. Furthermore, they were not
16 made with the specific intent to harm Plaintiff despite the provoking tweets clear intent to harm
17 Defendant. They were merely meant to serve as a deterrent in an effort to get the Plaintiff to
18 cease his unending harassment of Defendant. Despite numerous requests and reports, the FBI
19 and NYPD have failed to do anything. Mount Shasta PD have failed to do anything. This court
20 has yet to issue any order that might stop Plaintiff from abusing the legal system so Defendant
21 must rely on whatever civil means are at his disposal to defend himself and his public reputation
22 on twitter. Self-defense was the purpose of the responses, not the alleged malice.
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1 43. Defendant has merely repeated public statements made by the Plaintiff himself, the Plaintiffs
2 own family and the Plaintiff's former friend. No evidence has been presented to indicate these
3 statements are false and Defendant remains of the belief that the statements are true.

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5 44. Defendant has no reason to believe the statements are false. Defendant was reiterating
6 statements that exist in the public domain and was doing so to discourage further false,
7 defamatory and disruptive statements coming from the Plaintiff. This was an act of self-defense
8 online and pursuant to the unclean hands doctrine Plaintiff has no legitimate claim. Goodman
9 has no knowledge of Search Engine Optimization or how to do it and to the best of his
10 knowledge has never engaged in this activity even in the promotion of his own business let alone
11 for any purpose aimed at Plaintiff. Plaintiff's claim that Goodman's effort in this regard has
12 impacted his ability to market his professional services is contradicted by Plaintiff's own
13 statement that he is sitting around all day in his RV collecting retirement payments and doing
14 nothing but preparing lawsuits.
15

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17 45. To the best of Defendant's knowledge the statements are true and are merely republications
18 of prior public statements made either by Plaintiff, Plaintiff's family members or close associates
19 of the Plaintiff.

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21 47. Defendant has only used portions of images the Plaintiff has voluntarily published in the
22 public domain. Furthermore, as a limited purpose public figure who makes blog posts, public
23 tweets and YouTube videos which he claims are "counter speech" challenging Defendant's first
24 amendment protected statements, Plaintiff has thrust himself into the public discourse and as
25 such, has opened himself to criticism and commentary in precisely the same manner he alleges
26 Defendant has. The images in question have been substantially altered in a transformative way
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1 and used in parody "political cartoons". Defendant's artform is digital photography. Despite the
2 photo realistic nature of Defendant's political cartoons, they are specifically protected by section
3 107 of the copyright act as parody. This is another aspect of Defendant's work the Plaintiff has
4 repeatedly attacked and another factor that causes Defendant to believe Plaintiff played some
5 role in alerting the National Academy of Television Arts and Sciences of the alleged copyright
6 infringement of the EMMY image. Parody images of Plaintiff are used for the purpose of
7 criticism and commentary on the Plaintiff's statements and actions in the public domain. For
8 these reasons, Defendant does not require Plaintiff's permission to use them and the new images
9 derived from them are Defendant's intellectual property to do with as he chooses, including
10 commercialization and sale of the images.
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13 48. To reiterate, Defendant was totally unaware of Plaintiff before Plaintiff began his now years
14 long vendetta against Defendant. His persistence and obsessive dedication to continuing, even
15 while ignoring his own son, is in and of itself newsworthy. It remains an open question why
16 Plaintiff would be so pathologically dedicated to wrongfully disrupting Defendant. Defendant
17 regularly features well known public figures on his broadcasts including congressional
18 candidates, sitting senators, captains of industry, legal experts, well known journalists, authors
19 and more. There is absolutely no need, and no commercial value in specifically including
20 Plaintiff in any broadcast. Rather, his behavior represents a class of individual, a social engineer,
21 who attempts to use social media to shape public opinion. To the extent Plaintiff engages in that
22 activity in the course of his efforts to antagonize the Defendant, his activities are newsworthy,
23 and this is the reason he is included in any broadcast by Defendant.
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49. Sweigert's ongoing and deliberate disruption of Defendant's business and general activities is so overt, his persistence so abnormal, the activity is in and of itself newsworthy. Sweigert is as much a limited purpose public figure as Defendant Goodman in that they both engage in similar activity, publishing news, opinion and editorial via social media. To the extent the Plaintiff has a right to publish posts about Defendant, Defendant has the same right to respond in kind.

OVERT AND DANGEROUS LIBEL BY PLAINTIFF

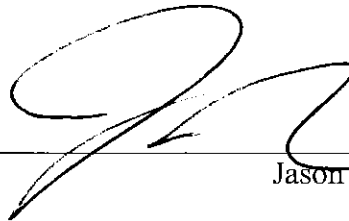
As stated repeatedly throughout these pleadings, Plaintiff has gone to extraordinary lengths both in his litigation against Defendant and his extreme extrajudicial efforts to inflict damage on the Defendant in any way he can. Perhaps the most egregious recent effort was a blatant false publication on Plaintiff's SDNY.INFO blog, clearly intended to paint Defendant as a racist and encourage public hatred and violence against him. On or around September 17, 2020 Goodman conducted a live broadcast during which he attempted to interview individuals participating in what appeared to be an unlawful assembly. Unlike legitimate protests or rallies, no NYPD personnel were present. When Goodman attempted to ask some of the participants if the event was a permitted protest and if so, why the NYPD were not present, Goodman was physically assaulted by a group of four to five mostly white males. Goodman was intimidated, pushed, struck and some of his property was destroyed. After the encounter, Goodman commented to his audience "that's why the cops shoot, ok." Goodman's statement was devoid of any racial undertones and was intended to convey the sense of fear and danger that a crowd of individuals intent on doing violence could rapidly foment, and how such encounters with police officers might be met with deadly force. The entire unedited video remains online on Goodman's YouTube channel where the court could review the exact words spoken by Goodman. This link

1 begins the video at precisely 51 minutes 41 seconds where the statement in question is made
2 <https://youtu.be/HOQyXNjJI6g?t=3101> Seizing on this almost immediately, Sweigert created a
3 blog post on his character assassination smear campaign web site SDNY.INFO which featured
4 the headline *Lawfare Guru Jason Goodman Involved in Street Fracas with BLM "This is why*
5 *police shoot... (them)"*. By putting this statement in quotation marks in the headline, Plaintiff
6 attributed it to Goodman. By making BLM the subject of the headline, Sweigert intentionally
7 causes his readers to believe that Goodman wanted NYPD to shoot BLM. Plaintiff went even
8 further in his effort to incite hatred and violence against the Defendant by superimposing an
9 image of Goodman over an extremely tall, heavysset black male who was among the four or five
10 assailants in the video, but didn't actually engage with Goodman during the incident. After three
11 years of broadcasting, Goodman is indeed a limited purpose public figure who is periodically
12 recognized on the streets of Manhattan and elsewhere. By publishing this false statement,
13 Goodman believes Sweigert intended to cause a member of the public to take violent retaliatory
14 action against Goodman. In today's racially charged climate, with law enforcement under
15 unprecedented pressure, this deliberate effort by Sweigert represents perhaps the most overt and
16 dangerous act so far in Plaintiff's constantly expanding harassment, defamation and slander
17 campaign. In further evidence of intent, Sweigert first altered the headline, then removed the
18 post entirely demonstrating intent to destroy the evidence of his wrongful act. To the extent that
19 the court can take action against Sweigert to prevent him from carrying on with such actions,
20 Defendant prays the court will. Sweigert has deleted the blog post to the best of Goodman's
21 knowledge, but not before Goodman printed it out (**EXHIBIT B**). Plaintiff's regular practice of
22 removing, altering or destroying evidence is further evidence of bad faith and another reason
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1 why any additional motion should be denied, and this matter should be dismissed with prejudice.
2 Goodman presented this printed evidence to NYPD's 10th precinct and officers there declined to
3 take action. Goodman prays the court will take action now, BEFORE Sweigert's outrageous
4 behavior results in damage Goodman may not recover from. More than any preceding action,
5 this malicious libel demonstrates that Sweigert is a menace to the public and anyone he doesn't
6 like, a potential danger to himself and those around him and a perpetual drain on the U.S. District
7 Court system. His insidious behavior is deliberate and methodical, and it is Defendant's belief
8 he has displayed overt psychopathic tendencies. Defendant prays the court will take immediate
9 action to curtail Sweigert's ability to engage in these actions by denying any further motions,
10 dismissing this matter with prejudice and declaring Sweigert a vexatious litigant.
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12

13
14 Signed this 29th day of October 2020



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(EXHIBIT A)

From: Spoliation Notice spoliation-notice@mailbox.org
Subject: Re: Identity of person calling Dr. Fauci's home unlisted number may have been identified
Date: March 30, 2020 at 10:54 AM
To: clane@niaid.nih.gov, hauguelt@niaid.nih.gov, deaweb@niaid.nih.gov, rpurcell@niaid.nih.gov, niaidtraining@nih.gov, LL153p@nih.gov, NIAIDSBIR@mail.nih.gov, Annie.grimes@nih.gov, anthony.fauci@nih.gov, Spoliation Notice spoliation-notice@mailbox.org
Cc: Brittany.Custer@ic.fbi.gov, nyspmail@troopers.ny.gov, legal@patreon.com, colin@patreon.com, bxjic@dps.texas.gov, tip@dps.texas.gov, tcic@dps.texas.gov, crimstatsinfo@ic.fbi.gov, NICS@ic.fbi.gov, nicc nicc@hq.dhs.gov, iso@ic.fbi.gov, nysag@ag.ny.gov, truth@crowdsourcethetruth.org, jason@21stcentury3d.com, jasongoodman72@protonmail.com

To: Jason Goodman

I have observed your recent comment to a YouTube video (attached).

This message makes certain parties aware that you are an alleged associate of the subject of the article "MONTEGRAPH" (see web page 1 below).

Apparently you have made telephone calls to Dr. Tammy Parry via the use of an alleged unlisted number. Social media rumors indicate you obtained this phone number from "MONTEGRAPH" (see web page 2 below).

<https://sdny.news/2020/03/29/new-york-city-braces-for-covid-19-black-death-mass-die-off-with-45-refrigerator-truck-trailers-to-store-3600-corpses/>

<https://sdny.news/2020/03/18/jason-goodman-films-patients-at-nycs-presbyterian-hospital-while-accused-by-montana-physician-of-obtaining-private-telephone-number-to-interfere-with-patient-care/>

D. George Sweigert
Evidence Collection Team



Jason Goodman 51 minutes ago

I thought you were an EMT, if this is a national emergency shouldn't you be occupiec driving around saving people rather than making insane videos about how you miss sleeping in dog excrement where your father who obviously knew your true value yo made you sleep



REPLY

(EXHIBIT B)

9/19/2020

Lawfare guru Jason Goodman involved in street fracas with BLM - "This is why police shoot ...(them)"



SDNY.ORG

Jason Goodman George Webb Cyber
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Updated: an hour ago

COUNTERLAWFARE FUND



CROWDSOURCE THE ORIGIN



Above: Jason "LawFare" Goodman has now taken on the John F. Kennedy assassination as part of his "lawfare" victimization fund.

SDNY.ORG
We'll supply evidence on the case

9/19/2020

Lawfare guru Jason Goodman involved in street fracas with BLM - "This is why police shoot ...(them)"



Above: Previous apparent "altercation" between conspiracy theorist Jason Goodman and BLM supporters (faces whited out to protect privacy).

<https://twitter.com/HoaxWars/status/1269811266698096641>

<https://twitter.com/HoaxWars/status/1275183864843927552>

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Samuel V. Eichner (SDNY Bar No. SE1967)
Margaret Esquenel (pro hac vice to be filed)
FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP
901 New York Avenue NW Washington, DC 20001

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JASON GOODMAN AND TISH JAMES

Privacy Policy

We'll reply as soon as we can.

9/19/2020

Lawfare guru Jason Goodman involved in street fracas with BLM - "This is why police shoot ...(them)"



Truth, Lies & Lawfare With The Most Sane Men on The Internet Special Guest Alex Jones
122 views · Jason Goodman · 1 day ago



Jason Goodman

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Above: In a recent podcast Jason Goodman and side-kick Alex Jones allegedly "targeted" Tish James



Recent Posts

Above: Jason Goodman (l) with Roger Stone (c) and unidentified Trump well wisher (r)

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97 · Write a comment

3

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ROGER STONE FALLOUT: Jason Goodman side-kicks distance...

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Jason Goodman takes to e-begging to raise EMMY lawsuit...

91 · Write a comment

3

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58 views

3

Let's Chat!

We'll reply as soon as we can

9/19/2020

Lawfare guru Jason Goodman involved in street fracas with BLM - "This is why police shoot ...(them)"

**Defendant****Jason Goodman**represented by **Jason Goodman**

252 7th Ave. #6s

New York, NY 10001

323.744-7594

PRO SE

"CrowdSource The Truth" is the pro-Trump conspiracy theory social media empire built up by Goodman (who allegedly shut down the Port of Charleston on June 14, 2017 with some kind of "dirty bomb hoax" incident). See libel cases presided over by Judge Valerie E. Caproni, S.D.N.Y. (libel case no. 1 = Port of Charleston, libel case no. 2 = EMMY Awards).

Click below for latest ORDER of Hon. Valerie E. Caproni which links the two libel lawsuits in the S.D.N.Y.



sweigert-v.-goodman-doc-154-g16-2020.pdf

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"CrowdSource the Truth" is currently being sued by the EMMY Awards for libel concerning Goodman's assertions that the CEO of the awards program may be part of a "C.I.A. mockingbird" operation (libel case no. 2).

9/19/2020

Lawfare guru Jason Goodman involved in street fracas with BLM - "This is why police shoot ...(them)"

10 pct



212

741

8245

Above: Jason Goodman appears to be in a scuffle with a "black" man on the streets of Lower Manhattan as he apparently intruded into a Black Lives Matter march.

OPINION AND EDITORIAL

Lawfare guru Jason Goodman, personal defendant in two libel lawsuits, of "CrowdSource The Truth", organizational defendant in another libel lawsuit, apparently got into a shoving and pushing altercation with the alleged "President" of Black Lives Matter New York.

Goodman stumbled into the supposed altercation while on a social media podcast livestream discussing the three lawsuits he is involved in. He used the opportunity to threaten assault charges against the people he met on the sidewalk.



This is allegedly the latest dust-up between Goodman and people of color on the sidewalks of New York City (Lower Manhattan).

Goodman, who lives in a swanky upscale apartment that has been listed in his official court documents, often ventures out apparently to insert himself into Black Lives Matter (BLM) protests.

Let the Clamor
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